

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In Re Flint Water Cases

Judith E. Levy
United States District Judge

Consolidated Docket No.
16-cv-10444

DEBORAH SAPOLIN, as
Personal Representative of
THE ESTATE OF
MARGARET A. BACON,

Plaintiff,

v

RICHARD SNYDER, *et al*,

Defendants.

**Individual Docket No.
5:18-cv-10348-JEL-MKM**

Previous E.D. Case No. 16-cv-11157

Genesee County Circuit Court

**PLAINTIFF'S MOTION FOR LEAVE TO FILE A SURREPLY TO
CITY DEFENDANTS' REPLY BRIEF IN SUPPORT OF THEIR
MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED SHORT
FORM COMPLAINT (DKT 86)**

NOW COMES Plaintiff, by and through her attorneys, Sinas, Dramis, Larkin, Graves & Waldman, P.C., and hereby requests leave to file the attached *Surreply to City Defendants' Reply Brief in Support of their Motion to Dismiss Plaintiff's First Amended Short Form Complaint (Dkt 86)* for the reason that the filing of a Surreply is necessary to prevent the Court from being misled by one or more of the rebuttal arguments contained in *City Defendants' Reply Brief in Support of their Motion to Dismiss Plaintiff's First Amended Short Form Complaint (Dkt 86)* (EFC #109). Plaintiff's proposed Surreply is only two pages in length, and narrowly addresses factual inaccuracies, and/or mischaracterizations contained in Defendants' aforesaid response brief.

Respectfully submitted:

**SINAS, DRAMIS, LARKIN
GRAVES & WALDMAN, P.C.**

By: /s/ Joel T. Finnell

Joel T. Finnell (P75254)
James F. Graves (P14288)
Jonathon K. Homa (P81518)
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Dated: August 10, 2020

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2020, I directed Emily A. Erbisich to electronically file the foregoing document using the EFC filing system, which will send notification of the filing and copies of the filed documents to all attorneys of record.

By: /s/ Joel T. Finnell
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